

COMMENTS OF THE REGISTRY OF INTERPRETERS FOR THE DEAF ON PAYMENT
FORMULA AND FUND SIZE ESTIMATE FOR INTERSTATE TRS FUND FOR JULY
2006 THROUGH JUNE 2007

CG Docket No. 03-123

The Registry of Interpreters of the Deaf, Inc. (RID), the national organization for sign language interpreters in the United States (1.), respectfully submits comments on the payment formula and fund size estimate for the interstate TRS fund for the period July 2006 – June 2007.

As the national association of professionals providing sign language interpretation services, a vital element of video relay services, we are concerned that the 2006 – 2007 VRS reimbursement rate will inhibit equal access to telecommunication services by Deaf and Hard of Hearing individuals.

Recent FCC orders implementing round the clock service, speed of answer as well as Spanish–ASL interpretation services require adequate reimbursement of the reasonable costs incurred by a provider.

The foundation of VRS services is interpretation services. To assure quality interpreting services, there needs to be an adequate number of interpreters working within adequate technological capabilities. Smooth, clear video allows for readability and interpretation of sign language users.

In order for the Deaf community to make use of VRS, there needs to be an awareness of the service, awareness of how to access the service, and access to the technology and equipment necessary. The proposed changes to the outreach funding impact this effort.

Quality Interpreting Services: A provision of Title IV of the ADA is qualified interpreters. In order to sustain a pool of qualified interpreters with provision of quality interpretation services, funding for recruitment, training, and retention of interpreters is needed. There needs to be adequate conditions that support

sustained quality interpreting services.

- o Funding of services which support appropriate number of qualified interpreters working;
- o Funding to support the numbers of interpreters needed. In order to assure sustained quality services, the fatigue factor of interpreting must be considered. With this in mind, reimbursement rates should take into account the number of interpreters needed to work with providing VRS services. The Federal Communications Commission Section 504 Programs & Activities Accessibility Handbook, (Section 504 Handbook) 2003, states:

“‘[M]ost people do not realize that an interpreter uses at least 22 cognitive skills when interpreting,’ states Patricia Michelsen in an article published in The Court Management and Administration Report. Other studies of simultaneous interpretation have shown that fatigue is exacerbated by environmental factors that interfere with various aspects of the cognitive process...

While these studies make an important contribution to the body of scientific data needed for a better understanding of the interpreting process and its complexities, they merely corroborate what practicing interpreters have known and argued all along: that work quality - i.e., accuracy and coherence - begins to deteriorate after approximately 30 minutes of sustained simultaneous interpreting, and that the only way to ensure a faithful rendition of legal proceedings is to provide interpreters with adequate relief at approximately half-hour intervals.” (2.)

Although the context of these comments is legal settings, the cognitive processes and fatigue factors remaining the same regardless of setting. In addition, environmental factors that support the interpretation process should be considered and funded.

- o Funding of CDI interpreters for situations of interpreting for Deaf individuals with challenging features of language such as minimal language skills or idiosyncratic signing styles.

Outreach to the Deaf community: Title IV of the ADA ensures equal access to telecommunications for all citizens of the United States, including Deaf individuals. Only by having continued and sustained outreach to the Deaf community can strides for equal access be achieved. In order to have greater access, there needs

to be awareness of VRS and access to equipment, and training. This requires funding for outreach, marketing and advertising.

Technical Enhancements: Technical enhancements need to be funded to provide equal access to Deaf individuals.

- o Solutions to E911 – Funding levels should incorporate application of solutions to E911 access as they become available.
- o Video/Audio quality enhancements - Funding levels should incorporate application of enhancements to video and audio quality as they become available.
- o Equal access By keeping pace with technological improvements, equal access for Deaf individuals becomes achievable.

Conclusion: The Registry of Interpreters for the Deaf requests that the above components of equal access be considered with setting the rate of compensation to providers.

Respectfully submitted,

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(1.) The Registry of Interpreters for the Deaf, Inc., (RID) is a national membership organization of professionals who provide sign language interpreting/transliterating services for Deaf and Hard of Hearing persons. Established in 1964 and incorporated in 1972, RID is a tax-exempt 501(c)(3) non-profit organization. RID advocates for the increased quality, qualifications, and quantity of interpreters through three main triads of services – professional certification, professional development, professional Code of Ethics.

See Registry of Interpreters for the Deaf website:

<http://rid.org/index.html>

(2.) The Federal Communications commission Section 504 Programs & Activities Accessibility Handbook, 2003

http://www.fcc.gov/cgb/dro/504/disability_primer_5-6-7.html